

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

LAZ Parking LTD, LLC)	
)	
-vs-)	
)	
Commonwealth Edison Company)	Docket No. 12-0324
)	
Complaint pursuant to Sections 9-250 and 10-108)	
of the Illinois Public Utilities Act and Section)	
200.170 of the Rules of Practice of the Illinois)	
Commerce Commission.)	

Direct Testimony of
TRISHAUN JAMISON
Senior Business Analyst
Revenue Management

Commonwealth Edison Company

February 18, 2016

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I. Introduction and Purpose

A. Identification of Witness

Q. What is your name and business address?

A. My name is Trishaun Jamison. My business address is Commonwealth Edison Company (“ComEd”), 1919 Swift Drive, Oak Brook, Illinois 60523.

Q. By whom are you employed and in what capacity?

A. I am currently employed by ComEd as a Manager in the billing department.

Q. Are you the same Trishaun Jamison who provided affidavits on behalf of ComEd in this docket?

A. Yes.

B. Purpose of Testimony

Q. What is the purpose of your direct testimony?

A. The purpose of my direct testimony is to explain the dollar values at issue in this case. First, I explain the dollar value of the unbilled delivery service provided to LAZ Parking LTD, LLC (“LAZ”) between June 3, 2008 and May 3, 2010. Second, I explain that the \$36,625.07 in charges for delivery service in ComEd’s September 20, 2010 Final Notice Prior to Disconnection (“Notice”) were completely separate from the unbilled delivery service issue.

C. Summary of Conclusions

Q. Please summarize the conclusions of your direct testimony.

A. First, I conclude that the dollar value of the unbilled delivery service provided between June 3, 2008 and May 3, 2010 was \$180,943.15. This is the only amount related to the

constant billing error discussed by ComEd witnesses Mr. Thomas Rumsey (ComEd Ex. 1.0) and Ms. Marisa Spitz (ComEd Exhibit 2.0). Second, I conclude that the \$36,625.07 in charges in the Notice was related to unpaid service provided by ComEd between May 5, 2010 and September 1, 2010, and had nothing to do with the two years of unbilled service (due to the incorrect constant) provided between June 3, 2008 and May 3, 2010.

D. Identification of Exhibits

Q. Are you sponsoring any attachments to your direct testimony?

A. Yes. I have attached the following exhibits to my testimony:

- **ComEd Exhibit (“Ex.”) 4.01** is a true and correct copy of my June 6, 2013 affidavit in support of Respondent’s Motion to Dismiss the Complaint on the Merits.
- **ComEd Ex. 4.02** is a true and correct copy of my June 26, 2015 affidavit in support of Respondent’s Motion for Summary Judgment.
- **ComEd Ex. 4.03** is a true and correct copy of ComEd’s Account Activity Statement for LAZ Parking Account Number 29310-08045, with the relevant charges and credits highlighted for ease of reference.
- **ComEd Ex. 4.04** is an excel spreadsheet that further illustrates the charges and credits shown on ComEd Ex. 4.03 that are related to the \$180,943.15 in unbilled service provided between June 3, 2008 and May 3, 2010.
- **ComEd Ex. 4.05** is a true and correct copy of ComEd’s September 20, 2010 Notice requesting payment of \$36,625.07.

- **ComEd Ex. 4.06** is an excel spreadsheet that further illustrates the charges and credits shown on ComEd Ex. 4.03 that are related to the \$36,625.07 in unpaid service provided between May 5, 2010 and September 1, 2010.

E. Background and Experience

Q. Ms. Jamison, please summarize your duties and responsibilities in your current position.

A. In my current position as a Manager in the billing department, I am responsible for leading the billing department. We handle billing exceptions, which involve billing issues that do not go through the automated billing process in ComEd's electronic billing system, known as the Customer Information & Marketing System ("CIMS"). I have held this position since July 27, 2015. Prior to that, from June 7, 2010 to July 26, 2015, I was a Senior Business Analyst in the Revenue Management department. In that role I was responsible for reviewing accounts that were in collection which included, but was not limited to, analyzing residential and commercial electric service accounts for billing accuracy and/or discrepancies, analyzing CIMS meter reading histories, and reviewing customer contacts, including disconnect notices. I also monitored governance of ComEd's credit policy. I have been employed by ComEd in various positions since 1994.

II. ComEd's Billing Process

Q. Did ComEd issue bills directly to LAZ?

A. No. LAZ purchases its electricity through a retail energy supplier ("RES"): MidAmerican Energy Company ("MidAmerican"). This means that MidAmerican procures energy supply for LAZ and ComEd provides delivery service of the energy that

MidAmerican procures. LAZ has also elected a single-bill option (“SBO”), which means that LAZ receives one bill from MidAmerican that contains both its energy supply and delivery service charges.

Q. Can you explain what an Account Activity Statement is?

A. Yes. ComEd’s Account Activity Statement for LAZ for the period December 2008 to November 2010 is attached hereto as ComEd Ex. 4.03. This is a report generated from information in CIMS. This report shows delivery service charges incurred by customers, credits issued by ComEd, and payments made by customers. ComEd pulls information from this report and provides it to RESs for their use in issuing SBOs.

III. The Dollar Value of the Unbilled Delivery Service Provided between June 3, 2008 and May 3, 2010

Q. What was the total value of the delivery service provided to LAZ between June 3, 2008 and May 3, 2010?

A. As shown on ComEd Ex. 4.03, the total value of the delivery service provided to LAZ between June 3, 2008 and May 3, 2010 was \$225,484.52. Specifically, the pages labeled CCLP 0000009-11 contain blue highlighted entries showing the charges and credits at issue. This is further illustrated on ComEd Ex. 4.04.

Q. Prior to May 2010, had ComEd already billed LAZ for any of that amount?

A. Yes. Prior to May 2010, ComEd billed LAZ – and LAZ correspondingly paid – for \$44,541.37 in delivery service. This means that LAZ had \$180,943.15 in unbilled delivery service charges (\$225,484.52 minus \$44,541.37).

88 **Q. How did ComEd account for those prior bills and corresponding payments?**

89 A. As explained by ComEd witness Ms. Marisa Spitz (ComEd Ex. 3.0) and as shown on the
90 pages labeled CCLP 0000006-8 in ComEd Ex. 4.03, when ComEd discovered the billing
91 error, ComEd cancelled the incorrect bills totaling \$44,541.37 for the June 3, 2008 to
92 May 3, 2010 time period. ComEd then rebilled the full amount of the \$225,484.52 for
93 the same time period. *See* ComEd Ex. 4.03 CCLP 0000009-11. I note that the rebill
94 encompassed two additional days, May 4 and 5, because it was keyed to the actual meter
95 read date of May 5. Cancelling the incorrect bills caused CIMS to issue a credit in the
96 amount of \$44,541.37, because LAZ had already paid those bills. *See* CCLP 0000009.

97 **Q. To be clear, what is the additional amount that ComEd charged LAZ due to the**
98 **billing error?**

99 A. ComEd charged LAZ – and LAZ paid – \$180,943.15 for unbilled delivery service
100 between June 3, 2008 and May 3, 2010.

101 **IV. The Notice Was Related to Unpaid Delivery Service Provided between May 5, 2010**
102 **and September 1, 2010, and is Not Related to the Unbilled Delivery Service**

103 **Q. What did the \$36,625.07 at issue in the Notice relate to?**

104 A. The \$36,625.07 at issue in the Notice, attached hereto as ComEd Ex. 4.05, related to
105 delivery service provided by ComEd to LAZ between May 5, 2010 and September 1,
106 2010.

107 **Q. Was LAZ billed for this delivery service within two years after the delivery service**
108 **was provided?**

109 A. Yes. LAZ was billed for this delivery service between July 9, 2010 and September 1,
110 2010.

111 **Q. Can you provide details for the \$36,625.07 in charges?**

112 A. Yes. ComEd Ex. 4.03 breaks down the charges and credits at issue. Specifically, the
113 pages labeled CCLP 0000011-12 contain yellow highlighted entries showing four months
114 of delivery service charges that total \$36,143.30; five late fees that total \$1,196.83; and a
115 credit in the exact amount of those late fees, that results in total charges and a
116 corresponding payment amount by LAZ of \$36,143.30. ComEd Ex. 4.06 is an excel
117 spreadsheet that further illustrates these highlighted entries.

118 I note that the sum of the delivery service charges and the late fees, \$37,340.13, is
119 slightly higher than the \$36,625.07 reflected in the Notice, attached hereto as ComEd Ex.
120 4.05, because LAZ incurred two late fees totaling \$715.06 on September 20 and 21,
121 2010, after ComEd issued the Notice. In any event, ComEd credited the amount of all
122 late fees so this did not impact the amount that LAZ eventually paid.

123 **Q. Does this conclude your direct testimony?**

124 A. Yes.